UNITED STATES DISTRIC SOUTHERN DISTRICT OF					
CISCO SYSTEMS, INC.		X :			
-against-	Plaintiff,	:	Civil Action SN	No.	1:20-CV-10879-LTS-
SYNAMEDIA LTD. F/K/A LIMITED	TRITON UK BIDCO	): :			
	Defendant.	: : x			

## PLAINTIFF CISCO SYSTEMS, INC.'S NOTICE OF MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Plaintiff Cisco Systems, Inc. ("Cisco"), by and through its counsel, will move this Court, at a date and time to be determined by the Court, for an order granting Cisco leave to file an amended complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure and for such further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that in accordance with Section III(A) of the Individual Practices of this Court, counsel for Cisco had a telephonic conference with counsel for Synamedia to discuss the contemplated motion. During the telephonic conference counsel for Synamedia indicated that they "do not plan to oppose," but would not commit to a final position. Counsel for Cisco repeatedly followed up with counsel for Synamedia as to Synamedia's final position, but received no response.

Dated: November 19, 2021

## Respectfully Submitted,

## /s/ Christopher J. Letkewicz

J. Erik Connolly (admitted *pro hac vice*)

Christopher J. Letkewicz (admitted *pro hac vice*) Lauren T. Tortorella (admitted *pro hac vice*)

David S. Almeida

BENESCH, FRIEDLANDER, COPLAN &

ARONOFF LLP

71 South Wacker Drive, Suite 1600

Chicago, Illinois 60606 Telephone: (312) 212-4949 Facsimile: (312) 767-9192

Email: econnolly@beneschlaw.com

cletkewicz@beneschlaw.com dalmeida@beneschlaw.com ltortorella@beneschlaw.com

Attorneys for Plaintiff Cisco Systems, Inc.

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**CERTIFICATE OF SERVICE** 

I hereby certify that on November 19, 2021, a copy of the foregoing Plaintiff Cisco

Systems, Inc.'s Notice of Motion for Leave to File an Amended Complaint was filed

electronically. Notice of this filing will be sent by operation of the Court's electronic filing system

to all parties indicated on the electronic filing receipt. Parties may access this filing through the

Court's system.

/s/ Christopher J. Letkewicz

Counsel for Plaintiff Cisco Systems, Inc.